

Hazardous Waste Compliance Inspection Report

Facility

Magna-Tek Laboratories, Inc.  
8505 Mid-County Industrial Drive  
St. Louis, Missouri 63114  
314/423-8280

MO. Generators I.D. #: 00399  
U.S. EPA I.D. #: MOD981709538

Introduction

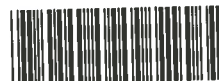
On April 14, 1989, an inspection of Magna-Tek Laboratories, Inc. was performed to assess compliance with the applicable rules and regulations of the Resource Conservation and Recovery Act and the Missouri Hazardous Waste Law. The Missouri Department of Natural Resources was represented by Mr. Dan Bennett, Environmental Specialist. The facility was represented by Mr. David Okenfuss, President, and Mr. Gary Lambarth, the company's waste consultant from Envir-all. Also present were Mr. Carl Okenfuss, Environmental Coordinator and Mr. Robert Harris, Foreman.

The facility's status had recently been updated to Large Quantity Generator. A copy of the updated HWG-1 form was provided to the inspector at the time of the inspection. Mr. Bennett had attempted an inspection on March 28, 1989, but a medical emergency prevented the company's Environmental Coordinator from providing access to the operating record.

Unsatisfactory Features

1. An Emergency Coordinator was not on call, in violation of 40 CFR 262.34.
2. The facility improperly identified a waste stream, in violation of 40 CFR 262.11.
3. Copies of the Notification of Land Disposal Restrictions were not being retained in the facility's operating record, in violation of 40 CFR 268.7(a).
4. Some manifests lacked required information, in violation of 10 CSR 25-5.262(2)(B).
5. Two manifests and one Summary Manifest Report were not on file, in violation of 10 CSR 25-5.262(2)(D).
6. Hazardous waste drums in storage were not properly labeled and were not dated, in violation of 10 CSR 25-5.262(2).
7. There was no secondary containment in the hazardous waste storage area, in violation of 10 CSR 25-5.262(2)(C)2.B.

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RCRA RECORDS

Comments

The inspection began with a discussion about the responsibilities of the Emergency Coordinator, and the necessity of having access to facility records for emergency response. The operators asserted that the Emergency Coordinator's heart attack was a unique situation, but that procedures would be developed to keep an alternate coordinator on call. The discussion was followed by a record review, which indicated that the facility had been generating greater than 1000 kilograms of waste nearly every month of their operation. Although the facility had originally notified as a Small Quantity Generator, the operators provided a copy of an updated notification indicating large quantity status. Methylene Chloride, the solvent used, is described by the EPA I.D. number F001. However, it is not used in degreasing operations and should be classified as F002.

There was a waste analysis for each waste stream, which indicated levels of Chromium of greater than 12 ppm in the solvent waste. Therefore, the identification number "D007" needs to be added to that waste stream. The operators asserted that notifications of land disposal restrictions were being sent with applicable shipments of waste, but copies of the notification's were not being maintained in the operating record.

A review of the manifests indicated that numbers one and two were not on file. Those manifests originated in the first quarter of 1987, but there was no Summary Manifest Report for that quarter. Some manifests were missing required information: #22 did not have the transporter's phone number; #20 did not have an EPA I.D. # for a material described as "hazardous solid"; and there were two manifests given the consecutive shipment number "14".

Following the record review, the operators led the inspector to the hazardous waste storage area. Fourteen drums were in storage. All were labeled "hazardous, solid, F002". The additional information required by the Missouri Hazardous Waste Law was not on any drum. At this point, there was a discussion about secondary containment. The inspector related that secondary containment is not required for solid hazardous waste, provided any spill would be contained within the facility. Secondary containment is required for liquid solvent waste. The requirements are described in 10 CSR 25-5.262(2)(C)2.B.

Recommendations

1. Describe, in writing, procedures for contacting alternate emergency coordinators.
2. Use the Notification of Hazardous Waste Activity form provided by the inspector to correctly identify the facility waste streams. Submit a copy to this office, as well as to the Waste Management Program in Jefferson City. Certify that the proper description will be provided for all future shipments.

3. Contact your disposal facility and obtain copies of the Notifications of Land Disposal Restrictions for shipments made after August 8, 1988. Retain copies for your files, and submit copies to this office.
4. Certify that the omitted information noted on some manifests will not be omitted on all future manifests.
5. Provide copies of the missing manifests and the missing Summary Manifest Report.
6. Label drums in storage with the information required by Missouri Hazardous Waste Law and date the drums from the time of initial accumulation.
7. Submit a plan and proposed construction date for secondary containment for the storage area.

Should you have any question regarding this report, please contact the St. Louis Regional Office.

APPROVED:

PREPARED BY:

*F. Donald Maddox*  
F. Donald Maddox  
Regional Administrator  
St. Louis Regional Office

5-10-89  
Date

*Dan Bennett*  
Dan Bennett  
Environmental Specialist  
St. Louis Regional Office

5-17-89  
Date

FDM/DB/cj

Enclosure

cc: CO - WMP

## LARGE QUANTITY GENERATOR CHECKLIST

Form LQG-INSP  
(10-15-88)Name of Facility: Magna-Tek Laboratories, Inc. Date: April 14, 1989Address: 9505 Mid-County Industrial Dr.  
St. Louis MO 63114Other Inspections Done:  
RR      TRANS      LDR       
OTHER     Phone: (314) 423-8280 MO ID# 00399 EPA ID# MO1481709539Facility Representative: David Olenfuss Title: President

Briefly describe manufacturing process(es). (Use continuation sheet, if needed.)

Paint-stripping of metal components for the automotive industry.  
      
      
      
    

List of wastes generated. (Use continuation sheet, if needed.)

Waste	Amount/Month	Disposition
1. <u>Waste Solvent F001</u>	<u>200 lbs</u>	<u>Fuel blending, Incineration</u>
2. <u>stripping Solids D008</u>	<u>200 lbs</u>	<u>Incineration</u>
3. <u>    </u>	<u>    </u>	<u>Ammonia Resource Recovery</u>
4. <u>    </u>	<u>    </u>	<u>    </u>
5. <u>    </u>	<u>    </u>	<u>    </u>

## A. MANIFESTS AND RECORDKEEPING 10 CSR 25-5.262(2) AND 5.262(2)(B) AND (D)

Generator's MO and EPA I.D. Numbers. . . . . (✓)

Manifest document number (MO I.D. & Shipment #). . . . . (✓)

EPA Waste I.D. codes . . . . . (✓)

Generator's name, address, phone # . . . . . (✓)

All Transporters' names, phone #'s, MO and EPA I.D. #'s. . . . . (✓)

Designated facility name, address, phone # and MO and EPA I.D. # . . . . . (✓)

Proper DOT Shipping Name, Hazard Class and I.D. # . . . . . (✓)

Containers, Quantity and Unit Wt/Vol being shipped properly designated . . . . . (✓)

Proper certification including waste minimization. . . . . (✓)

Manifest properly signed and dated . . . . . (✓)

No more than 10 days time between generator and facility signatures. . . . . (✓)

Manifests returned within 35 days. . . . . (✓)

If not, exception generator report submitted within 45 days. . . . . (NA)

Completed manifests and Summary Manifest Report and Certification. . . . . (✓)

Spills of reportable quantities reported to DNR. . . . . (NA)

## B. PRETRANSPORT, CONTAINERIZATION AND LABELING 10 CSR 25-5.262(2) AND 5.262(2)(C)1

Waste Packaged, marked and labeled per DOT during entire on-site storage period and prior to transport. . . . . (✓)

Placards available for use by transporters . . . . . (✓)

Satellite accumulation requirements met (if applicable). . . . . (NA)

a. Stored in satellite areas less than 1 year. . . . . (✓)

b. Containers marked identifying contents and beginning date . . . . . (✓)

c. Containers kept closed/compatible/good condition. . . . . (✓)

d. Quantities accumulated not exceeding 55 gal. (1 qt. acutely hazardous waste). . . . . (✓)

## C. STORAGE STANDARDS 10 CSR 25-5.262(2) AND 5.262(2)(C)2 AND 3

Facility inspected and maintained. . . . . (✓)

Date of accumulation marked. . . . . (✓)

Storage less than 90 days (unless small quantity generator). . . . . (✓)

## D. CONTAINER STORAGE 10 CSR 25-5.262(2) AND 5.262(2)(C)2

Containers in good condition . . . . . (✓)

Containers kept closed in storage. . . . . (✓)

Containers storing incompatible waste separated or protected from each other. . . . . (✓)

Containers of ignitable or reactive waste stored > 50 feet from property line . . . . . (✓)

Containers stored within a containment system (if applicable) meeting criteria of 10 CSR 25-5.262(2)(C)2.B. . . . . (✓)

E. STORAGE TANKS 10 CSR 25-5.262(2) AND 5.262(2)(C)2.C.  
(See tank checklist)

NA

F. PERSONNEL TRAINING 10 CSR 25-5.262(2)

Documentation of hazardous waste director's qualifications or training. (✓)  
Completed classroom or on-the-job training. . . . . (✓)  
Job title, description, and name of person filling position . . . . . (✓)  
Written record of the type and amount of training given . . . . . (✓)  
Documentation confirming that training has been given . . . . . (✓)

G. PREPAREDNESS AND PREVENTION 10 CSR 25-5.262(2) AND 5.262(2)(C)2.E.

Internal communication or alarm system. . . . . (✓)  
Device in the hazardous waste operation area capable of summoning emergency assistance. . . . . (✓)  
Fire control, spill control, and decontamination equipment available. . . . . (✓)  
Adequate water supply for fire control equipment. . . . . (✓)  
Adequate and proper safety equipment available. . . . . (✓)  
Adequate aisle space. . . . . (✓)  
Arrangements with local emergency agencies. . . . . (✓)

H. CONTINGENCY PLAN AND EMERGENCY PROCEDURES 10 CSR 25-5.262(2)

Contingency Plan. . . . . (✓)  
Detailed description of procedures that personnel must implement to respond to fires, explosions, or releases of hazardous waste. . . . . (✓)  
Describe formal arrangements with emergency agencies. . . . . (✓)  
Name, addresses, and phone numbers (home & office) of emergency coordinators. . . . . (✓)  
Emergency equipment including its description and location. . . . . (✓)  
Evacuation plan if applicable . . . . . (✓)

I. WASTE OIL 10 CSR 25-11.010

NA

Written waste oil contract maintained . . . . . ( )  
Waste oil properly stored and transported . . . . . ( )

COMMENTS: Operators were unsure of distinctions between Small  
Quantity - and Large Quantity Generators.

Inspector Signature & Title: Dan Bennett Environmental Specialist

Office: SLRO

IN COMPLIANCE

(✓)

IN VIOLATION OR  
ABSENT

( )